

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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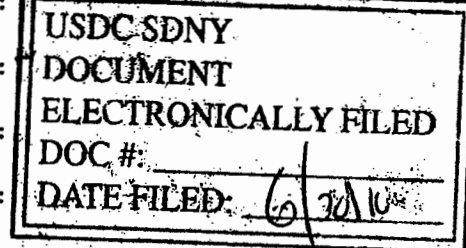
UNITED STATES OF AMERICA

- v. -

JONATHAN FELIZ,
a/k/a "Sweet Pea,"
a/k/a "Snoop,"
LOUINSKY MINIER,
a/k/a "Jayshawn,"
AMANTINO RAMOS,
a/k/a "Sco,"
SHAYNA ROSER,
a/k/a "Snow White,"
JUAN PARADAS,
a/k/a "Borracho,"
a/k/a "Borrachito,"
a/k/a "Johnny,"
JASMINE TORO,
a/k/a "Jazzy,"
GIL GARRIS,
a/k/a "Spec,"
RUDY SANTANA,
a/k/a "Gordo,"
MARCO RODRIGUEZ,
a/k/a "Black,"
ALBERTO MONTILLA,
a/k/a "Clue,"
JONAS COLON,
a/k/a "Shooter,"
HUBERT RODRIGUEZ,
a/k/a "Biyego,"
a/k/a "BG,"
YASHUA TORRES,
a/k/a "Jiggy,"
a/k/a "Jiggety,"
a/k/a "Jigga,"
EDWIN ESPINAL,
a/k/a "Nerd,"
JONATHAN DANIEL NARVAES,
a/k/a "JD,"
GABRIEL ABREU,
a/k/a "Weezy,"
JOHASSON GOMEZ CHONG,
a/k/a "Skinny,"
JOSE RODRIGUEZ,
a/k/a "Jay Jay,"

SEALED
SUPERSEDING
INDICTMENT

S10 09 Cr. 195 (GBD)



defendant, and others known and unknown, unlawfully, willfully, and knowingly, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the assault and attempted murder in aid of racketeering charged in Count Five of this Indictment, did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, including a handgun that was discharged at a victim on or about September 25, 2006.

(Title 18, United States Code, Sections
924(c)(1)(A)(iii), and 2.)

COUNT NINETEEN

The Grand Jury further charges:

46. In or about November 2006, in the Southern District of New York, JONATHAN FELIZ, a/k/a "Sweet Pea," a/k/a "Snoop," LOUINSKY MINIER, a/k/a "Jayshawn," and AMANTINO RAMOS, a/k/a "Sco," the defendants, and others known and unknown, unlawfully, willfully, and knowingly, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the assault and attempted murder in aid of racketeering charged in Count Six of this Indictment, did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and

possession of firearms, including two handguns that were discharged at two victims on or about November 23, 2006.

(Title 18, United States Code, Sections 924(c)(1)(A)(iii), 924(c)(1)(C)(i), and 2.)

COUNT TWENTY

The Grand Jury further charges:

47. In or about 2009, in the Southern District of New York and elsewhere, JONATHAN FELIZ, a/k/a "Sweet Pea," a/k/a "Snoop," and others known and unknown, unlawfully, willfully, and knowingly, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the conspiracy to murder in aid of racketeering charged in Count Seven of this Indictment, did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, including handguns that were discharged at victims in or about January 2009.

(Title 18, United States Code, Sections 924(c)(1)(A)(iii), 924(c)(1)(C)(i), and 2.)

COUNT TWENTY-ONE

The Grand Jury further charges:

48. In or about January 2009, in the Southern District of New York, ALBERTO MONTILLA, a/k/a "Clue," and others known and unknown, unlawfully, willfully, and knowingly, during and in relation to a crime of violence for which he may be prosecuted in

a court of the United States, namely, the attempted murder in aid of racketeering charged in Count Eight of this Indictment, did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, including a handgun that was discharged at a victim on or about January 18, 2009.

(Title 18, United States Code, Sections 924(c)(1)(A)(iii), 924(c)(1)(C)(i), and 2.)

COUNT TWENTY-TWO

The Grand Jury further charges:

49. In or about January 2009, in the Southern District of New York, RUDY SANTANA, a/k/a "Gordo," ALBERTO MONTILLA, a/k/a "Clue," the defendants, and others known and unknown, unlawfully, willfully, and knowingly, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the attempted murder in aid of racketeering charged in Count Nine of this Indictment, did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, including a handgun that was discharged at a victim on or about January 19, 2009.

(Title 18, United States Code, Sections 924(c)(1)(A)(iii), 924(c)(1)(C)(i), and 2.)

COUNT TWENTY-THREE

The Grand Jury further charges:

50. In or about January 2009, in the Southern District of New York, JONATHAN FELIZ, a/k/a "Sweet Pea," a/k/a "Snoop," the defendant, and others known and unknown, unlawfully, willfully, and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics trafficking offense charged in Count Ten of this Indictment, did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, including a Smith & Wesson .357 Magnum revolver; two Taurus 9-millimeter handguns; a Smith and Wesson 9-millimeter handgun; and an H&R .32 caliber revolver.

(Title 18, United States Code, Sections
924(c)(1)(A)(i), 924(c)(1)(C)(i), and 2.)

COUNT TWENTY-FOUR

The Grand Jury further charges:

51. On or about November 23, 2006, in the Southern District of New York, LOUINSKY MINIER, a/k/a "Jayshawn," the defendant, unlawfully, willfully, and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the offense charged in Count Ten of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a